

### REMARKS

By this Amendment the specification has been amended to include topic headings, and claims 1 and 12-15 have been amended to better define the inventive subject matter and overcome the examiner's formality rejection under 35 U.S.C. 112. Entry is requested.

A supplemental page 15 containing an abstract of the disclosure is attached hereto.

In the outstanding Office Action the examiner has rejected claims 1, 3 and 9 under 35 U.S.C. 102(b) as being anticipated by Whitehead, Pitts or Zheng.

This rejection is without merit. Whitehead discloses a lawn chair which includes interweaved tapes 11 that wrap around a metal frame 15 at their ends. Pitts discloses a file folder which includes a panel 12 having an end that surrounds a bar 34 and includes slotted openings that expose the bar. Zheng discloses a portable play structure which includes a fabric net 23 attached to a rim 22.

However, it really cannot be said that the metal frame 15 of Whitehead, or the bar 34 of Pitts, or the rim of Zheng are "partially embedded" in a fibrous substrate. And it certainly cannot be said that the lounge chair of Whitehead, the file folder of Pitts, or the play structure of Zheng suggest "a security substrate for producing documents."

The examiner's rejection based on Whitehead, Pitts and Zheng must be withdrawn.

The examiner has rejected claims 1-14 and 17 under 35 U.S.C. 103(a) as being unpatentable over Isherwood et al. in view of Murakami et al., and he has rejected claims 15 and 16 under 35 U.S.C. 103(a) as being unpatentable over these same references, further in view of Merry.

Isherwood et al. disclose a method of making a single ply paper containing an elongated impermeable strip at least partially embedded therein and viewable through windows formed in the paper. As recognized by the examiner, Isherwood et al. do not disclose exposing at least one edge of the elongated element in a window and providing a gap between the element and the perimeter of the aperture.

Murakami et al. disclose anti-falsification paper which includes a thread exposed at window portions provided on the surface of the paper. However, the apertures therein do not extend through the paper, and the edges of the thread are not observable in the aperture that is provided in the surface of the paper.

Thus, no combination of Murakami et al. with Isherwood et al. can suggest the claimed invention. And nothing in Merry would change this.


The applicant asserts that the presented claims define novel and patentable subject matter.

Favorable action is requested.

Respectfully submitted,

DYKEMA GOSSETT PLLC

By:

A handwritten signature in black ink, appearing to read 'R. Tushin', written over a horizontal line.

Richard H. Tushin  
Registration No. 27,297  
Franklin Square, Third Floor West  
1300 I Street, N.W.  
Washington, DC 20005-3353  
(202) 906-8600